



# JTPA

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Serving the People of California

DIRECTIVE

Date: May 23, 1996

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TO: SERVICE DELIVERY AREA ADMINISTRATORS  
PRIVATE INDUSTRY COUNCIL CHAIRPERSONS  
JTPD PROGRAM OPERATORS  
EDD JOB SERVICE OFFICE MANAGERS  
JTPD STAFF

SUBJECT: YOUTH EMPLOYMENT COMPETENCIES

## EXECUTIVE SUMMARY:

### Purpose:

This Directive establishes policies and procedures for the development, documentation, and reporting of employment competencies for youth under the Job Training Partnership Act (JTPA). It includes the attachment "Standards for Acceptable Pre-assessment and Post-assessment Documentation."

### Scope:

The requirements in this Directive apply to Service Delivery Areas (SDA) that report employment competency attainment outcomes for youth.

### Effective Date:

This Directive is effective July 1, 1996.

## REFERENCES:

- JTPA Section 106(a), (b)(4)(A)(i) & (5)
- Attachment to Department of Labor (DOL) Training and Employment Information Notice (TEIN) 10-88, transmitted with JTPA Information Bulletin 88-12, Subject: TEIN 10-88, Program Year 1988/89 Performance Standards, November 21, 1988
- DOL TEIN 5-93, Change 1, Subject: JTPA Standardized Program Information Report Instructions, June 23, 1994
- JTPA Information Bulletin 94-122, Subject: Revised JTPA Standardized Program Information Report (SPIR) Instructions, August 10, 1994
- JTPA Client Forms Handbook
- JTPA Directive D95-25, Subject: Standards for PIC Oversight and Instructions for Substate Monitoring, December 20, 1995

## **STATE-IMPOSED REQUIREMENTS:**

This Directive contains state-imposed requirements which are printed in ***bold, italic type***.

## **FILING INSTRUCTIONS:**

This Directive supersedes JTPA Directive 88-5, Rev. 1, Subject: Youth Employment Competencies, April 9, 1990. Retain this Directive until further notice.

## **BACKGROUND:**

As part of the Job Training Reform Amendments of 1992, JTPA Section 106(a) describes job training as “an investment in human capital,” and states that one of the measurements of “the basic return on the investment” is “increased educational attainment and occupational skills.” The JTPA Section 106(b)(4)(A) cites the attainment of employment competencies as one of the factors in setting performance standards for youth in Title II-C programs. Section 106(a)(5) requires Private Industry Councils (PIC), in consultation with appropriate educational agencies, and, where appropriate, the private sector, labor organizations, and community based organizations, to set youth competency levels, based on factors such as entry level skills and other hiring standards.

The TEIN 5-93, Change 1 (transmitted under JTPA Information Bulletin 94-122), Appendix B, states that youth employment competency system requirements “remain unchanged.” Prior JTPA Directive 88-5, Rev. 1, identified the federal requirements and added certain state requirements. This Directive revises some of the language in Directive 88-5, Rev. 1. It further clarifies the documentation requirements, adds information regarding tiered competency systems, and identifies state-imposed requirements in ***bold, italic type*** print.

## **POLICY AND PROCEDURES:**

### **I. STANDARDS**

- A. Employment competencies, including minimum required competency levels, must be approved by the PIC.
- B. The SDA must have a “sufficiently developed system,” as defined in Section II below.
- C. Competency gains must be tracked through program participation.
- D. In order for credit to be claimed, the youth must demonstrate proficiency in two or more of the following three competency areas: Pre-employment/Work Maturity Skills, Basic Education Skills, and Job-Specific Skills.
- E. In order for Pre-employment/Work Maturity Skills credit to be claimed, the youth must, at a minimum, demonstrate proficiency in all 11 core competency areas required in the SPIR, and the youth must have been deficient in at least 5 of the 11 as documented on the pre-assessments.

- F. ***In order for Basic Education Skills credit to be claimed, the youth must, at a minimum, demonstrate competency in reading comprehension and math computation, and the youth must have been deficient in at least one of these two, as documented on the pre-assessment.*** The PIC shall establish the Basic Education Skills competency level based on skills required by the local labor market.
- G. ***In order for Job-Specific Skills credit to be claimed, the youth must, at a minimum, demonstrate proficiency in primary Job-Specific Skills, and must have been deficient in the primary skills, as documented on the pre-assessment.***

## II. SUFFICIENTLY DEVELOPED SYSTEM

A sufficiently developed youth employment competency system must include the following structural and procedural elements:

- A. Quantifiable Learning Objectives: The PIC-approved competency statements that are quantifiable, employment-related, measurable, verifiable learning objectives that specify the proficiency to be achieved as a result of program participation. Employment competencies/quantifiable learning objectives approved by the PIC as relevant to the SDA must include an:
- Indicator: description of the skills/knowledge/attitudes/behavior to be taught;
  - Benchmark: the level of achievement to be attained. The level of achievement should enhance the youth's employability and opportunities for postprogram employment; and
  - Assessment: the means of measurement to be used to demonstrate competency accomplishment.
- B. Related Curricula, Training Modules, and Approaches: Focused curricula, training modules, or behavior modification approaches which teach the employment competencies in which the youth are found to be deficient. Such related activities, components, or courses must encompass participant orientation, work site supervisor/instructor/community volunteer training, and staff development endeavors as appropriate. They also must include, as appropriate, relevant agreements, manuals, implementation packages, instructions, and guidelines. A minimum duration of training must be specified which allows sufficient time for youth to achieve those skills necessary to obtain their learning objectives.
- C. Pre-assessment (Pre-test): Assessment of participant employment competency needs at the start of the program to determine if youth require assistance and are capable of benefiting from available services. A minimum level of need must be established before a participant is eligible to be tracked as a potential "attained PIC-recognized youth employment competency" outcome. All assessment techniques must be objective, unbiased and conform to widely accepted measurement criteria. Measurement methods used must contain clearly defined

criteria, be field tested for utility, consistency, and accuracy, and provide for the training/preparation of all raters/scorers.

- D. Post-assessment (Post-test/Evaluation): Evaluation of participant achievement at the end of the program to determine if competency-based learning gains took place during project enrollment. Intermediate checking to track progress is encouraged. All evaluation techniques must be objective, unbiased and conform to widely accepted evaluation criteria. Measurement methods used must contain clearly defined criteria, be field tested for utility, consistency, and accuracy, and provide for the training/preparation of all raters/scorers.
- E. Employability Development Planning (Individual Service Strategy Development): Use of assessment results in assigning a youth to appropriate learning activities/sites in the proper sequence to promote participant growth and development, remedy identified deficiencies, and build upon strengths.
- F. Documentation: Maintenance of participant records and necessary reporting of competency-based outcomes to document intra-program learning gains achieved by youth.
- G. Certification: Proof of youth employment competency attainment in the form of a certificate for participants who achieve predetermined levels of proficiency to use as evidence of this accomplishment and to assist them in entering the labor market.

### III. COMPETENCY AREAS

In order to attain a youth employment competency, an individual must have demonstrated proficiency in two or more of the following three skill areas in which the individual was deficient at enrollment: Pre-employment/Work Maturity Skills, Basic Education Skills, and Job-Specific Skills.

- A. Pre-employment/Work Maturity Skills: Pre-employment and work maturity are linked competencies, and proficiency in both is required for claiming competency attainment.

Pre-employment Skills: include world of work awareness, labor market knowledge, occupational information, values clarification and personal understanding, career planning and decision making, and job search techniques (resumes, interviewing, applications, and follow-up letters). They also encompass survival/daily living skills such as using the phone, telling time, shopping, renting an apartment, opening a bank account, and using public transportation.

Work Maturity Skills: include positive work habits, attitudes, and behavior such as punctuality, regular attendance, presenting a neat appearance, getting along and working well with others, exhibiting good conduct, following instructions and completing tasks, accepting constructive criticism from supervisors and co-workers, showing initiative and reliability, and assuming the responsibilities involved with maintaining a job. This category also entails developing motivation.

The SDAs may develop competency statements for any of the above-listed skills. However, in order for credit to be taken for Pre-employment/Work Maturity Skills, individuals must demonstrate proficiency, either on the pre-assessment or the post-assessment evaluation, in each of the 11 core competencies listed below, and they must have been deficient in at least 5 of the 11, as documented on the pre-assessments. Numbers 1 through 5 are Pre-employment competencies; numbers 6 through 11 are Work Maturity competencies. At least 1 PIC-certified competency statement must be developed/quantified for each of the following 11:

1. Making Career Decisions
2. Using Labor Market Information
3. Preparing Resumes
4. Filling Out Applications
5. Interviewing
6. Being Consistently Punctual
7. Maintaining Regular Attendance
8. Demonstrating Positive Attitudes/Behavior
9. Presenting Appropriate Appearance
10. Exhibiting Good Interpersonal Relations
11. Completing Tasks Effectively

The SDAs must utilize the same Pre-employment/Work Maturity competency statements for all client populations, with the exception of special needs clients incapable of attaining the standard competencies. The state strongly encourages SDAs to develop Work Maturity competencies (6 through 11) that are achieved in a work setting or in training designed to approximate a work environment.

- B. Basic Education Skills: include reading comprehension, math computation, writing, speaking, listening, problem solving, reasoning, and the capacity to use these skills in the workplace.

The SDAs may develop competency statements for any of the above-listed skills. ***However, in order for credit to be taken for Basic Education Skills, the youth must, at a minimum, demonstrate competency in reading comprehension and math computation, and the youth must have been deficient in at least one of these two, as documented on the pre-assessment. At least one PIC-certified competency statement must be developed/quantified for each.***

- C. Job-Specific Skills: include both primary and secondary job-specific skills.

Primary Job-Specific Skills: encompass the proficiency to perform actual tasks and technical functions required by certain occupational fields at entry, intermediate or advanced levels.

Secondary Job-Specific Skills: entail familiarity with and use of set-up procedures, safety measures, work-related terminology, recordkeeping and paperwork formats, tools, equipment and materials, and breakdown and clean-up routines.

The state strongly encourages SDAs to develop competency statements for both primary and secondary Job-Specific Skills, since both are relevant to occupational competency.

***In order for credit to be taken for Job-Specific Skills, a participant must, at a minimum, demonstrate proficiency in primary Job-Specific Skills, and must have been deficient in the primary skills, as documented on the pre-assessment. For each occupation in which Job-Specific Skills competency attainment credit will be taken, the PIC must either establish a separate competency statement for each primary and, if applicable, secondary skill, or one competency statement for the occupation which includes a list of all primary and secondary tasks/duties as the indicators of the required skills. For competency credit to be taken, participants must achieve the minimum PIC-approved benchmark/score for all primary and secondary skills included in the competency statement.***

***For those SDAs which develop customized Job-Specific Skills with individual employers, it may be appropriate (and is allowable) for the PIC to delegate authority to the SDA administrative entity to develop the requisite skill specifications, curricula/teaching methods, and measurement/evaluation methods as part of the contract negotiations with the individual employers; in such instances, the PIC shall designate the occupations or occupational clusters for which competency credit will be taken, and include a general statement of the competency level required. The statement must indicate that the participant will be competent in all of the skills specified in each training contract, based on the measurement/evaluation method specified in each contract.***

#### IV. TIERED COMPETENCY SYSTEMS

The SDAs may design “tiered” competencies in which youth may obtain credit in the same skill area when new or additional learning objectives are achieved. The SDAs may take credit for a youth attaining competency in the same skill area for a subsequent time period as long as the program sets different learning objectives and offers a different curriculum, training module, instructional mode or teaching material for that participant. Such programs are not required to terminate youth at year’s end and may choose to carry over participants in the same skill area until all competencies are achieved.

The SDAs with a tiered competency system for some client populations and a single tier for others must ensure that multiple tier and single tier competencies are consistent, i.e., that all indicators of skill are present in both and that benchmarks required for the final tier are consistent with those in the single tier system. Exceptions may be made for special needs populations incapable of attaining the standard competencies.

## V. DOCUMENTATION REQUIREMENTS

Each SDA must be able to demonstrate through appropriate documentation that it has a method in place to assess, record, and verify the performance of youth against the competency standards approved by the PIC. If youth are to be reported as having attained employment competencies, SDAs must maintain, at a minimum, the following documentation:

- A. The PIC-approved competency statements in two or more of the three competency skill areas (Pre-employment/Work Maturity Skills, Basic Education Skills, Job-Specific Skills). Each statement must contain quantifiable learning objectives, as required for a sufficiently developed system.
- B. Evidence of PIC approval of each competency skill for which credit is taken. The PIC approval can be documented by:
  - A copy of the PIC meeting minutes attesting to the approval. Such minutes must be dated and must clearly indicate which skill areas are recognized and what competency statements have been approved for each skill area.
  - A letter or other document signed by the PIC chair/alternate. Such documentation must clearly indicate the specific competency areas and statements approved, and the actions taken by the PIC to approve them, including the date(s) of approval.
  - Other written documentation that clearly demonstrates that the PIC has taken the necessary actions to approve the competency system.
- C. Related curricula/training modules/approaches as required for a sufficiently developed system. A minimum duration of training which allows sufficient time for a youth to achieve those skills necessary to attain their learning objectives must be specified ***in hours***.
- D. Program records and participant files. Such records must, at a minimum, include:
  1. Pre-assessment (pre-test) documentation in at least two of the three competency areas which substantiates that the individual did not have the employment competencies recognized by the PIC prior to JTPA participation. For Pre-employment/Work Maturity Skills, the client must be deficient in at least 5 of the 11 core competencies. ***For Basic Education Skills, the client must be deficient in either or both reading comprehension and math computation. For Job-Specific Skills, the client must be deficient in primary Job-Specific Skills.***
  2. Post-assessment (post-test) evaluation documentation which substantiates the attainment of the PIC-recognized competencies. This must include post-assessments in at least two competency areas in which the pre-assessments indicated deficiencies. For Pre-employment/Work Maturity Skills, there must be post-assessments indicating proficiency in each of the

11 core competencies in which the individual was found to be deficient in the pre-assessment, with a minimum of 5 achieved through program participation in order for credit to be taken. ***For Basic Education Skills, there must be post-assessment(s) indicating proficiency in reading comprehension and/or math computation (both if the pre-assessment indicated deficiency in both), with at least one achieved through program participation in order for credit to be taken. For Job-Specific Skills, the post-assessment must indicate proficiency in the primary Job-Specific Skills in which the individual was found to be deficient in the pre-assessment, and in secondary skills if they are included as part of the competency statement and the participant was found deficient in the pre-assessment.***

***NOTE: Refer to the attached “Standards for Acceptable Pre-assessment and Post-assessment Documentation” for further information, including additional state-imposed requirements.***

3. An employability development plan documented on the Individual Service Strategy (ISS) which indicates the use of pre-assessment and post-assessment results in assigning a youth to appropriate learning activities/sites in the proper sequence to promote participant growth and development, remedy identified deficiencies, and build upon strengths.
4. A copy of the certificate that was issued to the youth, documenting the individual's attainment of the applicable competencies.

## VI. REPORTING REQUIREMENTS

In order to report (i.e., take credit for) “Attained Employment Competency” for youth, the SDA must have a sufficiently developed system as defined in this Directive. All such attainments must be in two or more competency areas in which the individuals were deficient at enrollment. All competency attainments must be reported as required by the SPIR, ***the state’s JTPA Client Forms Handbook, and the state’s “Quarterly Status Report Participation and Termination Summary” (JTPA 10).***

## VII. SUBCONTRACTING

***The SDAs that subcontract with service providers for youth competency training must ensure that all subcontractors adhere to the requirements set forth in this Directive. This does not preclude SDAs from establishing more prescriptive competency systems as long as the requirements are consistently applied to all service providers serving the same client groups.***

## VIII. OVERSIGHT AND MONITORING

***The SDAs must have procedures for oversight to ensure that youth employment competencies meet the requirements of a sufficiently developed system and have acceptable documentation which verifies that the reported learning gains occurred as a result of program participation. The SDAs that subcontract with subrecipients and/or vendors to provide youth employment***



***competency training must ensure that their procedures are in compliance with JTPA Directive D95-25, Subject: Standards for PIC Oversight and Instructions for Substate Monitoring.***

**ACTION:**

The SDAs which report “Attained Employment Competency” outcomes for youth must ensure that their youth competency systems adhere to the provisions of the Directive, effective July 1, 1996. If the SDA’s current youth competency systems do not meet all of the requirements in this Directive, the systems must be revised as needed and the revisions must be approved by the PIC. The SDAs should provide copies of this Directive and/or applicable information from this Directive to service providers involved in the provision, documentation and reporting of Youth Employment Competencies.

**INQUIRIES:**

Please direct inquiries concerning this Directive to your Program Manager or to Georganne Pintar, Manager of the Policy Unit, at (916) 654-7611.

/S/ VICKI J. JOHNSRUD  
Acting Chief

Attachment

## STANDARDS FOR ACCEPTABLE PRE-ASSESSMENT AND POST-ASSESSMENT DOCUMENTATION

### A. General

Methods used for pre-assessments and post-assessment evaluations may take various forms. Whichever format is chosen for a given competency, the criteria used to establish competency attainment and the methodology must be designed to provide objective results, and must be quantifiable, measurable, verifiable and employment-related. The method chosen should be that which most clearly and effectively documents competency attainment. It is the responsibility of Service Delivery Areas (SDA) and Private Industry Councils (PIC) to develop the indicators, competency levels, and assessment methods for their competency systems which meet the minimum federal and **state-imposed** requirements set forth in the Directive and this attachment. Within these guidelines, pre-assessments and post-assessments may take any of the following forms:

- Pencil and paper tests taken by the participant.
- Oral questioning with documented responses (may be appropriate for special populations, e.g., individuals with disabilities and special education students; except for developmentally disabled and handicapped persons, the use of oral questions for Basic Education Skills is not appropriate).
- Work sampling with documented results.
- Documented behavioral observations.

Pre-assessments must be designed as part of the Objective Assessment required by the Job Training Partnership Act (JTPA) for each participant. Pre-assessment and post-assessment evaluation results must be documented on the Individual Service Strategy. ***For the purposes of monitoring and other reviews by the state, SDAs which directly operate youth competency training must have on file copies of the assessments completed by the clients and scored by the instructors/trainers. The SDAs may accept subcontractor certification of assessment results without requiring that copies of tests be forwarded to the SDA. However, SDAs must ensure through their established monitoring and oversight procedures that appropriate subcontractor assessment documentation exists. State monitors and other reviewers may require a review of completed assessment tests. The SDAs that utilize academic school testing or state-certified instructors for the pre-assessments and post-assessments of Basic Education Skills may accept school records (e.g., transcripts, instructor appraisals, or other written documentation from the school) or instructor verification regarding assessment results.***

## B. Pre-employment/Work Maturity Skills

Pre-assessments must indicate deficiency in at least 5 of the 11 required core competencies. Post-assessments are required for all core competencies in which the participant was found to be deficient in the pre-assessments. Proficiency must be demonstrated (either in the pre-assessment or the post-assessment) in each of the 11 core competencies for credit to be taken. Numbers 1 through 5 are Pre-employment skills, while numbers 6 through 11 are Work Maturity skills. The following provides suggested or commonly-used methods, and/or **state-imposed requirements** regarding each of the 11. As stated above, assessments may take various forms. The SDAs may employ one or a combination of methods for each. The state strongly encourages SDAs to develop Work Maturity competencies that are conducted in a work setting or training designed to approximate a work environment.

1. Making Career Decisions: pencil and paper tests; oral questions with documented responses.
2. Using Labor Market Information: pencil and paper tests; oral questions with documented responses.
3. Preparing Resumes: oral questions with documented responses (pre-assessment) or work sampling (pre-assessment, post-assessment).

***Deficiency in the pre-assessment may be based on “presumptive need” indicators. For example, the client does not know what a resume is, has heard of one but doesn’t know its purpose or what it should contain, has never prepared one, etc. If the individual brings in a resume or claims to have completed one, presumptive need may be established if they cannot identify resume types (e.g., chronological, functional, and combination) or cannot describe the sections and appropriate information to be provided in each section. If there are no presumptive need indicators, then SDAs may base the pre-assessment on the rating of a resume (i. e., a work sampling) bought in or completed onsite by the client. (NOTE: SDAs which do not employ presumptive needs indicators as part of their pre-assessment procedures must use this method).***

***If deficient as measured against the PIC-approved competency level/benchmark/score (through either presumptive need or a rated resume), then another resume must be completed and rated for the post-assessment. Resumes must be completed using a word processor or a typewriter, unless it can be shown that circumstances precluded access to such. If a word processor or typewriter is not accessible, a legible handwritten resume may be accepted for post-assessment documentation, and in such cases, there must be instruction to the participant that resumes given to employers must be typewritten. In the case of individuals with***

***disabilities which prevent them from completing the resume, the rater may complete the resume based on instructions from the client, but may not simply complete the resume for the client.***

4. Filling Out Applications: work sampling.

***The pre-assessment must be based on the completion of an application (work sampling), which may be a JTPA program application, by the client; if deficient, then another application must be completed by the client and rated for the post-assessment. Applications may be typewritten or handwritten. In the case of individuals with disabilities which prevent them from filling out the application, the rater may complete the application based on instructions from the client, but may not simply complete the application for the client.***

5. Interviewing: oral questions/behavioral observations.

***Pre-assessments and post-assessments must, at a minimum, consist of observing and questioning clients during interview settings or situations, with documented results/ratings. The JTPA intake interview, a mock interview, or other appropriate interview setting must be used for the pre-assessment. A mock interview or other appropriate interview setting must be used for the post-assessment.***

6. Being Consistently Punctual: documented behavioral observations.

***The pre-assessment and post-assessment must be based on the documented observation of the client's behavior in a work, training, or other institutional/structured setting. The pre-assessment must be based on one or more of a variety of indicators, such as: documented previous work/school/institutional record of tardiness within the previous year; lateness for an intake appointment/interview without an acceptable excuse; and/or lateness within the first two weeks to a JTPA training site without an acceptable excuse. The post-assessment must be based on the observation of the participant in a structured work/training setting over a period of at least 10 days, and must be documented with time records and/or written attestation by the supervisor/instructor specifying the time period and rating/score achieved.***

7. Maintaining Regular Attendance: documented behavioral observations.

***The pre-assessment must be based on one or more of the following indicators: documented previous work/school/institutional record of poor attendance within the previous year; failure to arrive for or remain at an intake appointment/interview without an acceptable excuse; and/or failure to arrive or stay at a JTPA training site within the first two weeks without an acceptable excuse. The post-assessment must be based on the***

**observation of the participant in a structured work training activity over a period of at least 10 days, and must be documented with attendance records and/or written attestation by the supervisor/instructor specifying the time period and rating/score achieved.**

8. Demonstrating Positive Attitudes/Behavior: documented behavioral observations.

**The behavioral observations for the post-assessment must occur over a minimum of 10 days in a work/training setting.**

9. Presenting Appropriate appearance: documented behavioral observations.

**The behavioral observations for the post-assessment must occur over a minimum of 10 days in a work/training setting.**

10. Exhibiting Good Interpersonal Relations: documented behavioral observations.

**The behavioral observations for the post-assessment must occur over a minimum of 10 days in a work/training setting.**

11. Completing Tasks Effectively: work sampling with documented results and/or documented behavioral observations.

**If behavioral observations constitute the post-assessment, the observations must occur over a minimum of 10 days in a work/training setting.**

Use of “Presumptive Need” Indicators Regarding the Pre-assessment of Work Maturity Skills (numbers 6 through 11):

The SDAs may develop a set of indicators designed to show an overall, general “presumptive need” for assistance in all six Work Maturity Skills. Such a set of indicators must be based on objective criteria designed to measure lack of job-keeping capabilities. For example: client has never worked for an extended period (should be at least 90 days) for one employer (excluding government-funded employment and training programs), does not provide a written recommendation from a previous employer, has been fired from at least one job, etc.

**The SDAs that use a general “presumptive need” test for the pre-assessment of the six core Work Maturity Skills shall apply the following minimum standards:**

- **The assessment shall consist of at least three indicators;**
- **In order to be considered in presumptive need, a majority of the indicators must be documented as applicable to the client;**
- **Documentation of the applicable indicators shall be appropriate to substantiate the validity of each, and may consist of things such as:**

***material in the participant records gathered for intake/eligibility purposes; contacts with former employer(s) of the client; behavioral observations; and other appropriate methods.***

For those clients not found to be in presumptive need of Work Maturity Skills, SDAs may design additional or alternate pre-assessments which measure each of the six core Work Maturity Skills individually, as described above. The SDAs which do not use a presumptive needs pre-assessment must develop such individuated pre-assessments.

### C. Basic Education Skills

***Pre-assessments must indicate deficiency in reading comprehension and/or math computation. Post-assessment(s) must be completed for either or both if PIC-approved competency levels are not met in the pre-assessment(s).***

Reading comprehension and math computation pre-assessments and post-assessments may be either “off-the-shelf” tests or specially-developed tests. Reading and math test scores from the most recent school year may be utilized for the pre-assessment, and school testing may also be employed for the post-assessments. All tests must be objective and unbiased, conform to widely-accepted and clearly-defined measurement criteria, be field-tested for utility in measuring what they purport to measure, and must be verifiable for applicability to local labor market needs.

Assessments may be designed to measure a single competency level approved by the PIC as necessary for entry into the local labor market. They also may be designed to measure a client’s ability to enter into to a particular job or career field, with required competency levels varying according to the requirements for different occupations. A third strategy involves enrolling the client in a program such as the General Equivalency Diploma (GED), with competency based on passing scores in reading and math, and sometimes other areas (e.g., the other three parts of the GED). The SDAs also may design basic education competency assessments combining various strategies.

The “incremental strategy” of setting an across-the-board grade level increase in Basic Education Skills is not an appropriate measure of a client’s basic employability. Therefore, simply raising a participant’s reading or math competency level by one or two grades is not considered valid by DOL for competency attainment and credit. Youth Employment Competency outcomes must be employment-related and relevant to the SDA, and contribute to the participant’s employability and opportunities for postprogram employment. Grade level increases must be based on requirements for entry into the local labor market, as described above.

### D. Job-Specific Skills

***Pre-assessments and post-assessments must, at a minimum, be designed to measure primary Job-Specific Skills competency.***

The pre-assessment may consist of a presumptive need assessment based on whether the client meets at least one of the following criteria:

- Has no job experience AND has not successfully completed skills training (received certificate or credential) in the occupation in which training will be provided.
- Has not previously worked in the occupation for more than 50 percent of the planned occupational training time AND has not successfully completed skills training (received certificate or credential) in the occupation in which the training will be provided.
- Has worked in the occupation in which training will be provided for no more than three months; AND the business required the employee to perform only a few of the expected job duties OR the employer significantly reduced the job duties after the worker was hired OR the employee was unable to perform the majority of job tasks using the technology/systems/machines, etc., prevalent in the field; AND has not successfully completed skills training (received certificate or credential) in the occupation in which training will be provided.

Acceptable documentation of the above may consist of notes/comments on the pre-assessment and/or material in the client records gathered for intake, eligibility, or other assessment purposes.

For clients not having a presumptive need per the above criteria, need may be demonstrated through pre-assessments designed for separate occupations or occupational areas/clusters, administered by the SDA or, if applicable, by occupational training providers.

The post-assessment must be designed to measure the achievement of the PIC-approved Job-Specific Skills in the occupation or occupational cluster in which training was received. The assessment must be administered by the employer, supervisor, instructor, or other person in a position to evaluate the client's achievement of the competencies.